

OBSERVATIONS & RECOMMENDATIONS

After reviewing data collected from **Crescent Lake, Acworth**, the program coordinators have made the following observations and recommendations.

Thank you for your continued hard work sampling the lake this year! Your monitoring group sampled the deep spot **three** times this year and has done so for many years! As you know, conducting multiple sampling events each year enables DES to more accurately detect water quality changes. Keep up the good work!

We encourage your monitoring group to continue utilizing the Colby Sawyer College Water Quality Laboratory in New London. This laboratory was established to serve the large number of lakes/ponds in the greater Lake Sunapee region of the state. This laboratory is inspected by DES and operates under a DES approved quality assurance plan. We encourage your monitoring group to utilize this laboratory next summer for all sampling events, except for the annual DES biologist visit. To find out more about the Colby Sawyer College Water Quality Laboratory, and/or to schedule dates to pick up bottles and equipment, please call Bonnie Lewis, laboratory manager, at (603) 526-3486.

FIGURE INTERPRETATION

CHLOROPHYLL-A

- **Figure 1 and Table 1:** Figure 1 in Appendix A depicts the historical and current year chlorophyll-a concentration in the water column. Table 1 in Appendix B lists the minimum, maximum, and mean concentration for each year that the lake has been monitored through VLAP.

Chlorophyll-a, a pigment found in plants, is an indicator of the algal abundance. Algae (also known as phytoplankton) are typically microscopic, chlorophyll producing plants that naturally occur in lake ecosystems. The chlorophyll-a concentration measured in the water gives biologists an estimation of the algal concentration or lake

productivity. **The median summer chlorophyll-a concentration for New Hampshire's lakes and ponds is 4.58 mg/m³.**

The current year data (the top graph) show that the chlorophyll-a concentration ***remained stable*** from **June** to **July**, and then ***increased*** from **July** to **September**.

The historical data (the bottom graph) show that the **2010** chlorophyll-a mean is ***approximately equal to*** the state median and is ***slightly less than*** the similar lake median. For more information on the similar lake median, refer to Appendix F.

Overall, the statistical analysis of the historical data (the bottom graph) shows that the mean annual chlorophyll-a concentration has ***not significantly changed*** since monitoring began. Specifically, the mean annual chlorophyll-a concentration has ***fluctuated between approximately 2.82 and 9.19 mg/m³***, but has ***not continually increased or decreased*** since **1990**. Please refer to Appendix E for a detailed statistical analysis explanation and data print-out.

While algae are naturally present in all lakes and ponds, an excessive or increasing amount of any type is not welcomed. In freshwater lakes and ponds, phosphorus is the nutrient that algae typically depend upon for growth in New Hampshire lakes. Algal concentrations may increase as nonpoint sources of phosphorus from the watershed increase, or as in-lake phosphorus sources increase. Therefore, it is extremely important for volunteer monitors to continually educate all watershed residents about management practices that can be implemented to minimize phosphorus loading to surface waters.

TRANSPARENCY

- **Figure 2 and Tables 3a and 3b:** Figure 2 in Appendix A shows the historical and current year data for transparency with and without the use of a viewscope. Table 3a in Appendix B lists the minimum, maximum and mean transparency data without the use of a viewscope and Table 3b lists the minimum, maximum and mean transparency data with the use of a viewscope for each year that the lake has been monitored through VLAP.

Volunteer monitors use the Secchi disk, a 20 cm disk with alternating black and white quadrants, to measure how far a person can see into the water. Transparency, a measure of water clarity, can be affected by the amount of algae and sediment in the water, as well as the

natural lake color of the water. **The median summer transparency for New Hampshire's lakes and ponds is 3.2 meters.**

The current year data (the top graph) show that the non-viewscope in-lake transparency **increased** from **June** to **July**, and then **decreased** from **July** to **September**.

It is important to note that as the chlorophyll concentration **increased** from **July** to **September**, the transparency **decreased**. We typically expect this **inverse** relationship in lakes. As the amount of algal cells in the water **increases**, the depth to which one can see into the water column typically **decreases**, and vice-versa.

The historical data (the bottom graph) show that the **2010** mean non-viewscope transparency is **approximately equal to** the state median and is **greater than** the similar lake median. Please refer to Appendix F for more information about the similar lake median.

The current year data (the top graph) show that the viewscope in-lake transparency **decreased gradually** from **June** to **September**. The transparency measured with the viewscope was generally **greater than** the transparency measured without the viewscope this summer. A comparison of the transparency readings taken with and without the use of a viewscope shows that the viewscope **typically increases** the depth to which the Secchi disk can be seen into the lake, particularly on sunny and windy days. We recommend that your group measure Secchi disk transparency with and without the viewscope on each sampling event.

It is important to note that viewscope transparency data are not compared to a New Hampshire median or similar lake median. This is because lake transparency with the use of a viewscope has not been historically measured by DES. At some point in the future, the New Hampshire and similar lake medians for viewscope transparency will be calculated and added to the appropriate graphs.

Overall, the statistical analysis of the historical data (the bottom graph) shows that the mean annual non-viewscope transparency has **not significantly changed** since monitoring began. Specifically, the transparency has **fluctuated between approximately 2.53 and 4.47 meters**, but has **not continually increased or decreased** since **1990**. Please refer to Appendix E for the detailed statistical analysis explanation and data print-out.

Typically, high intensity rainfall causes sediment-laden stormwater runoff to flow into surface waters, thus increasing turbidity and decreasing clarity. Efforts to stabilize stream banks, lake and pond shorelines, disturbed soils within the watershed, and especially dirt

roads located immediately adjacent to the edge of tributaries and the lake or pond should continue on an annual basis. Guides to best management practices that can be implemented to reduce, and possibly even eliminate, nonpoint source pollutants, are available from DES upon request.

TOTAL PHOSPHORUS

- **Figure 3 and Table 8:** The graphs in Figure 3 in Appendix A show the amount of epilimnetic (upper layer) phosphorus and hypolimnetic (lower layer) phosphorus; the inset graphs show current year data. Table 8 in Appendix B lists the annual minimum, maximum, and median concentration for each deep spot layer and each tributary since the lake has been sampled through VLAP.

Phosphorus is typically the limiting nutrient for vascular aquatic plant and algae growth in New Hampshire's lakes and ponds. Excessive phosphorus in a lake or pond can lead to increased plant and algal growth over time. **The median summer total phosphorus concentration in the epilimnion (upper layer) of New Hampshire's lakes and ponds is 12 ug/L. The median summer phosphorus concentration in the hypolimnion (lower layer) is 14 ug/L.**

The current year data for the epilimnion (the top inset graph) show that the phosphorus concentration **increased** from **June** to **July**, and then **remained stable** from **July** to **September**.

The historical data show that the **2010** mean epilimnetic phosphorus concentration is **slightly less than** the state and similar lake medians. Refer to Appendix F for more information about the similar lake median.

The current year data for the hypolimnion (the bottom inset graph) show that the phosphorus concentration **increased** from **June** to **July**, and then **decreased** from **July** to **September**.

The hypolimnetic (lower layer) turbidity sample was **slightly elevated** on the **July and August** sampling events (**1.71 and 2.26 NTUs**). This suggests that the lake bottom may have been disturbed by the anchor or by the Kemmerer Bottle while sampling and/or that the lake bottom is covered by an easily disturbed thick organic layer of sediment. When the lake bottom is disturbed, phosphorus rich sediment is released into the water column. When collecting the hypolimnion sample, make sure that there is no sediment in the Kemmerer Bottle before filling the sample bottles.

The historical data show that the **2010** mean hypolimnetic phosphorus concentration is ***approximately equal to*** the state median and is ***slightly less than*** the similar lake median. Please refer to Appendix F for more information about the similar lake median.

Overall, the statistical analysis of the historical data shows that the epilimnetic (upper layer) and hypolimnetic (lower layer) phosphorus concentration has ***not significantly changed*** (either *increased* or *decreased*) since monitoring began. Specifically, the mean annual epilimnetic and hypolimnetic phosphorus concentration has remained ***relatively stable, ranging between approximately 5 and 21 ug/L*** (excluding 1995 data), since **1990**. Please refer to Appendix E for the statistical analysis explanation and data print-out.

One of the most important approaches to reducing phosphorus loading to a waterbody is to continually educate watershed residents about the watershed sources of phosphorus and how excessive phosphorus loading can negatively impact the ecology and the recreational, economical, and ecological value of lakes and ponds.

TABLE INTERPRETATION

➤ **Table 2: Phytoplankton**

Table 2 in Appendix B lists the current and historical phytoplankton and/or cyanobacteria observed in the lake. Specifically, this table lists the three most dominant phytoplankton and/or cyanobacteria observed in the sample and their relative abundance in the sample.

The dominant phytoplankton and/or cyanobacteria observed in the **July** sample were ***Asterionella (Diatom)***, ***Dinobryon (Golden-Brown)***, and ***Tabellaria (Diatom)***.

Phytoplankton populations undergo a natural succession during the growing season. Please refer to the “Biological Monitoring Parameters” section of this report for a more detailed explanation regarding seasonal plankton succession. Diatoms and golden-brown algae populations are typical in New Hampshire’s less productive lakes and ponds.

➤ **Table 4: pH**

Table 4 in Appendix B presents the in-lake and tributary current year and historical pH data.

pH is measured on a logarithmic scale of 0 (acidic) to 14 (basic). pH is important to the survival and reproduction of fish and other aquatic life. A pH below 6.0 typically limits the growth and reproduction of fish. A pH between 6.0 and 7.0 is ideal for fish. The median pH value for the epilimnion (upper layer) in New Hampshire's lakes and ponds is **6.6**, which indicates that the state surface waters are slightly acidic. For a more detailed explanation regarding pH, please refer to the "Chemical Monitoring Parameters" section of this report.

The mean pH at the deep spot this year ranged from **6.17** in the hypolimnion to **6.44** in the epilimnion, which means that the water is ***slightly acidic***.

It is important to point out that the hypolimnetic (lower layer) pH was ***lower (more acidic)*** than in the epilimnion (upper layer). This increase in acidity near the lake bottom is likely due to the decomposition of organic matter and the release of acidic by-products into the water column.

Due to the state's abundance of granite bedrock in the state and acid deposition received from snowmelt, rainfall, and atmospheric particulates, there is little that can be feasibly done to effectively increase lake pH.

➤ **Table 5: Acid Neutralizing Capacity**

Table 5 in Appendix B presents the current year and historical epilimnetic ANC for each year the lake has been monitored through VLAP.

Buffering capacity (ANC) describes the ability of a solution to resist changes in pH by neutralizing the acidic input. The median ANC value for New Hampshire's lakes and ponds is **4.8 mg/L**, which indicates that many lakes and ponds in the state are at least "moderately vulnerable" to acidic inputs. For a more detailed explanation about ANC, please refer to the "Chemical Monitoring Parameters" section of this report.

The mean acid neutralizing capacity (ANC) of the epilimnion (upper layer) was **3.6 mg/L**, which is ***slightly less than*** the state median. In addition, this indicates that the lake is ***moderately vulnerable*** to acidic inputs.

➤ **Table 6: Conductivity**

Table 6 in Appendix B presents the current and historical

conductivity values for tributaries and in-lake data. Conductivity is the numerical expression of the ability of water to carry an electric current, which is determined by the number of negatively charged ions from metals, salts, and minerals in the water column. The median conductivity value for New Hampshire's lakes and ponds is **40.0 uMhos/cm**. For a more detailed explanation, please refer to the "Chemical Monitoring Parameters" section of this report.

The mean annual epilimnetic conductivity at the deep spot this year was **34.3 uMhos/cm**, which is ***slightly less than*** the state median.

The conductivity in the lake is relatively ***stable*** and ***low***. Typically conductivity levels greater than 100 uMhos/cm indicate the influence of pollutant sources associated with human activities. These sources include septic system leachate, agricultural runoff, and road runoff which contains road salt during the spring snow-melt. We hope this trend continues!

However, it is possible that de-icing materials applied to nearby roadways during the winter months may be influencing the conductivity in the lake. In New Hampshire, the most commonly used de-icing material is salt (sodium chloride).

Therefore, we recommend that the **epilimnion** (upper layer) be sampled for chloride next year. This additional sampling may help us identify what areas of the watershed are contributing to the increasing in-lake conductivity.

Please note that the DES Limnology Center in Concord is able to conduct chloride analyses, free of charge. As a reminder, it is best to conduct chloride sampling in the spring as the snow is melting and during rain events.

➤ **Table 8: Total Phosphorus**

Table 8 in Appendix B presents the current year and historical total phosphorus data for in-lake and tributary stations. Phosphorus is the nutrient that limits the ability of algae and aquatic plants to grow and reproduce. Please refer to the "Chemical Monitoring Parameters" section of this report for a more detailed explanation.

The total phosphorus concentration in the **West Inlet** was ***elevated*** (**52 ug/L**) on the **July** sampling event. The turbidity of the sample was also ***elevated*** (**4.3 NTUs**), as well as the *E. coli* concentration (**> 2,000 cts/100mL**). This suggests that the stream bottom may have been disturbed while sampling due to low flows.

Also, this station has had a history of ***elevated*** and ***fluctuating***

phosphorus concentrations. The headwaters of West Inlet originate at a small beaver pond. This pond likely influences total phosphorus concentrations during periods of high water flow that discharge phosphorus-enriched water into the tributary. Also, stream bottom sediment is likely saturated with phosphorus and contributes to elevated concentrations when disturbed.

➤ **Table 9 and Table 10: Dissolved Oxygen and Temperature Data**

Table 9 in Appendix B shows the dissolved oxygen/temperature profile(s) collected during **2010**. Table 10 in Appendix B shows the historical and current year dissolved oxygen concentration in the hypolimnion (lower layer). The presence of sufficient amounts of dissolved oxygen in the water column is vital to fish and amphibians and bottom-dwelling organisms. Please refer to the “Chemical Monitoring Parameters” section of this report for a more detailed explanation.

The dissolved oxygen concentration was ***much lower in the hypolimnion (lower layer) than in the epilimnion (upper layer)*** at the deep spot on the **July** sampling event. As stratified lakes age, and as the summer progresses, oxygen typically becomes ***depleted*** in the hypolimnion by the process of decomposition. Specifically, the reduction of hypolimnetic oxygen is primarily a result of biological organisms using oxygen to break down organic matter, both in the water column and particularly at the bottom of the lake or pond where the water meets the sediment. When hypolimnetic oxygen concentration is depleted to less than 1 mg/L, ***as it was on the annual biologist visit this year and on many previous annual visits***, the phosphorus that is normally bound up in the sediment may be re-released into the water column, a process referred to as ***internal phosphorus loading***.

Low hypolimnetic oxygen levels are a sign of the lake’s ***aging*** health. This year the DES biologist collected the dissolved oxygen profile in **July**. We recommend that the annual biologist visit for the **2011** sampling year be scheduled during **June** so that we can determine if oxygen is depleted in the hypolimnion ***earlier*** in the sampling year.

➤ **Table 11: Turbidity**

Table 11 in Appendix B lists the current year and historical data for in-lake and tributary turbidity. Turbidity in the water is caused by suspended matter, such as clay, silt, and algae. Water clarity is strongly influenced by turbidity. Please refer to the “Other Monitoring Parameters” section of this report for a more detailed explanation.

As discussed previously, the hypolimnetic (lower layer) turbidity was **slightly elevated (1.71 and 2.26 NTUs)** on the **July and September** sampling events. In addition, the hypolimnetic turbidity has been elevated on many sampling events during previous sampling years. This suggests that the lake bottom may have been disturbed by the anchor or by the Kemmerer Bottle while sampling and/or that the lake bottom is covered by an easily disturbed, thick organic layer of sediment. When the lake bottom is disturbed, phosphorus rich sediment is released into the water column. When collecting the hypolimnion sample, make sure that there is no sediment in the Kemmerer Bottle before filling the sample bottles.

The turbidity of the epilimnion (upper layer) sample was **slightly elevated (1.71 NTUs)** on the **September** sampling event. This suggests that a rainstorm may have recently contributed stormwater runoff to the lake and/or an algal bloom had occurred in the lake.

The turbidity in **West Inlet** was **slightly elevated (1.47 and 4.3 NTUs)** on the **June and July** sampling events, which suggests that the stream bottom may have been disturbed while sampling or that erosion is occurring in this area of the watershed. When the stream bottom is disturbed, sediment, which typically contains attached phosphorus, is released into the water column. When collecting tributary samples please sample where there's sufficient stream flow and depth to collect a "clean" sample free from debris and sediment.

➤ **Table 12: Bacteria (*E.coli*)**

Table 12 in Appendix B lists the current year and historical data for bacteria (*E.coli*) testing. *E. coli* is a normal bacterium found in the large intestine of humans and other warm-blooded animals. *E.coli* is used as an indicator organism because it is easily cultured and its presence in the water, in defined amounts, indicates that sewage **may** be present. If sewage is present in the water, potentially harmful disease-causing organisms **may** also be present.

The *E. coli* concentration was **low** at the **Outlet** sampled on the **July** and **October** sampling events. Specifically, each result was **50 counts or less**, which is **much less than** the state standard of 406 counts per 100 mL for recreational surface waters that are not designated public beaches and 88 counts per 100 mL for surface waters that are designated public beaches.

The **#3 Cold Pond Rd** *E. coli* concentration was **elevated** on the **October** sampling event. However, the concentration of **340** counts per 100 mL **was not greater than** the state standard of 406 counts per 100 mL for recreational waters that are not designated public beaches.

If you are concerned about *E. coli* levels at this station, your monitoring group should conduct rain event sampling and bracket sampling in this area to help us determine the bacteria source.

For a detailed explanation on how to conduct rain event sampling and stream surveys, please refer to the 2002 VLAP Annual Report special topic article, which is posted on the VLAP website at <http://www.des.nh.gov/organization/divisions/water/wmb/vlap/categories/publications.htm>, or contact the VLAP Coordinator.

The **West Inlet** *E. coli* concentration was **elevated** on the **July** and **October** sampling events. The concentration of **> 2,000 and 930** counts per 100 mL **was greater than** the state standard of 406 counts per 100 mL for recreational waters that are not designated public beaches.

Rain event and bracket sampling were conducted in October following a significant period of dry weather. It is common after pro-longed periods of dry weather and no stream flow to experience elevated bacteria levels during the first significant rainfall. Bacteria sources in the localized watershed have been concentrated and can be transported to the nearest surface water, particularly in areas frequented by wildlife or domestic animals. We suspect that beaver activity as well as other wildlife such as otter or muskrat may be influencing the *E. coli* concentrations at this station.

The **Chicken** *E. coli* concentration was **elevated** on the **October** sampling event. The concentration of **480** counts per 100 mL **was greater than** the state standard of 406 counts per 100 mL for recreational waters that are not designated public beaches.

This station was established as a result of homeowners building a chicken coop close to the lake's shoreline and concern over the potential for bacterial contamination. The elevated *E. coli* result following 2.5 inches of rainfall indicates that the chicken manure is impacting the lake. We recommend contacting the Department of Agriculture at 271-3685 to request an Agricultural Inspector visit the site.

The **North Shore Rd** *E. coli* concentration was **elevated** on the **October** sampling event. The concentration of **1,210** counts per 100 mL **was greater than** the state standard of 406 counts per 100 mL for recreational waters that are not designated public beaches.

The **Northeast Inlet** *E. coli* concentration was **elevated** on the **July** and **October** sampling events. The concentrations of **540** and **610**

counts per 100 mL **was greater than** the state standard of 406 counts per 100 mL for recreational waters that are not designated public beaches.

We recommend conducting a stream survey during the annual biologist visit at the Northeast Inlet and North Shore Rd. stations.

➤ **Table 13: Chloride**

Table 13 in Appendix B lists the current year and the historical data for chloride sampling. The chloride ion (Cl⁻) is found naturally in some surfacewaters and groundwaters and in high concentrations in seawater. Research has shown that elevated chloride levels can be toxic to freshwater aquatic life. In order to protect freshwater aquatic life in New Hampshire, the state has adopted **acute and chronic** chloride criteria of **860 and 230 mg/L** respectively. The chloride content in New Hampshire lakes is naturally low, generally less than 2 mg/L in surface waters located in remote areas away from habitation. Higher values are generally associated with salted highways and, to a lesser extent, with septic inputs. Please refer to the “Chemical Monitoring Parameters” section of this report for a more detailed explanation.

Chloride sampling was **not** conducted during **2010**.

➤ **Table 14: Current Year Biological and Chemical Raw Data**

Table 14 in Appendix B lists the most current sampling year results. Since the maximum, minimum, and annual mean values for each parameter are not shown on this table, this table displays the current year “raw,” meaning unprocessed, data. The results are sorted by station, depth, and then parameter.

➤ **Table 15: Station Table**

As of the spring of 2004, all historical and current year VLAP data are included in the DES Environmental Monitoring Database (EMD). To facilitate the transfer of VLAP data into the EMD, a new station identification system had to be developed. While volunteer monitoring groups can still use the sampling station names that they have used in the past and are most familiar with, an EMD station name also exists for each VLAP sampling location. Table 15 in Appendix B identifies what EMD station name corresponds to the station names you have used in the past and will continue to use in the future.

DATA QUALITY ASSURANCE AND CONTROL

Annual Assessment Audit:

During the annual visit to your lake, the biologist conducted a sampling procedures assessment audit for your monitoring group. Specifically, the biologist observed the performance of your monitoring group and completed an assessment audit sheet to document the volunteer monitors' ability to follow the proper field sampling procedures, as outlined in the VLAP Monitor's Field Manual. This assessment is used to identify any aspects of sample collection in which volunteer monitors failed to follow proper procedures, and also provides an opportunity for the biologist to retrain the volunteer monitors as necessary. This will ultimately ensure samples that the volunteer monitors collect are truly representative of actual lake and tributary conditions.

Overall, your monitoring group did an **excellent** job collecting samples on the annual biologist visit this year! Specifically, the members of your monitoring group followed the proper field sampling procedures and there was no need for the biologist to provide additional training. Keep up the good work!

Sample Receipt Checklist:

Each time your monitoring group dropped off samples at the laboratory this summer, the laboratory staff completed a sample receipt checklist to assess and document if your group followed proper sampling techniques when collecting the samples. The purpose of the sample receipt checklist is to minimize, and hopefully eliminate, improper sampling techniques.

Overall, the sample receipt checklist showed that your monitoring group did an **excellent** job when collecting samples and submitting them to the laboratory this year! Specifically, the members of your monitoring group followed the proper field sampling procedures and there was no need for the laboratory staff to contact your group with questions, and no samples were rejected for analysis.

USEFUL RESOURCES

Best Management Practices to Control Nonpoint Source Pollution: A Guide for Citizens and Town Officials, DES Booklet WD-03-42, (603) 271-2975 or

www.des.nh.gov/organization/commissioner/pip/publications/wd/documents/wd-03-42.pdf.

Canada Geese Facts and Management Options, DES fact sheet BB-53, (603) 271-2975 or

<http://des.nh.gov/organization/commissioner/pip/factsheets/bb/documents/bb-53.pdf>.

Lake Protection Tips: Some Do's and Don'ts for Maintaining Healthy Lakes, DES fact sheet WD-BB-9, (603) 271-2975 or www.des.nh.gov/organization/commissioner/pip/factsheets/bb/documents/bb-9.pdf.

Low Impact Development Hydrologic Analysis. Manual prepared by Prince George's County, Maryland, Department of Environmental Resources. July 1999. To access this document, visit www.epa.gov/owow/nps/lid_hydr.pdf or call the EPA Water Resource Center at (202) 566-1736.

Low Impact Development: Taking Steps to Protect New Hampshire's Surface Waters, DES fact sheet WD-WMB-17, (603) 271-2975 or www.des.nh.gov/organization/commissioner/pip/factsheets/wmb/documents/wmb-17.pdf.

NH Stormwater Management Manual Volume 1: Stormwater and Antidegradation, DES fact sheet WD-08-20A, (603) 271-2975 or <http://des.nh.gov/organization/commissioner/pip/publications/wd/documents/wd-08-20a.pdf>

NH Stormwater Management Manual Volume 2: Post-Construction Best Management Practices Selection and Design, DES fact sheet WD-08-20B, (603) 271-2975 or <http://des.nh.gov/organization/commissioner/pip/publications/wd/documents/wd-08-20b.pdf>

NH Stormwater Management Manual Volume 3: Erosion and Sediment Controls During Construction, DES fact sheet WD-08-20C, (603) 271-2975 or <http://des.nh.gov/organization/commissioner/pip/publications/wd/documents/wd-08-20c.pdf>

Vegetation Maintenance Within the Protected Shoreland, DES fact sheet WD-SP-5, (603) 271-2975 or <http://des.nh.gov/organization/commissioner/pip/factsheets/sp/documents/sp-5.pdf>

Watershed Districts and Ordinances, DES fact sheet WD-WMB-16, (603) 271-2975 or www.des.nh.gov/organization/commissioner/pip/factsheets/wmb/documents/wmb-16.pdf.